

EXHIBIT 1

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GotNews, LLC & Charles C. Johnson*

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOEL VANGEHLUWE, et al.,

Plaintiffs,

v.

GOTNEWS, LLC, et. al.

Defendants.

Case No.: 2:18-cv-10542-LJM-EAS

**DEFENDANT CHARLES JOHNSON'S
OFFER OF JUDGMENT TO PLAINTIFF
JOEL VANGHELUWE**

Defendant Charles Johnson makes the following offer of judgment under Fed. R. Civ. P. 68 to Plaintiff Joel Vangheluwe. Defendant makes this offer more than 14 days before the date set for trial in accordance with Fed. R. Civ. P. 68(a).

Plaintiff Joel Vangheluwe has sued a shareholder of an LLC with absolutely no justification nor argument for piercing the corporate veil. Nevertheless, rather than bear the expense of litigation, Mr. Johnson is willing to allow judgment to be taken against him to resolve Plaintiff Joel Vangheluwe's claims.

Pursuant to Fed. R. Civ. P. 68, Mr. Johnson hereby offer Plaintiff Joel Vangheluwe to take a judgment against him in this action to include the following: **The total sum of \$4,990, inclusive of Plaintiff Joel Vangheluwe's costs (including Plaintiff Joel Vangheluwe's attorneys' fees), accrued to the date of this offer, to be paid by Mr. Johnson, for all causes of action and claims for damages set forth in Plaintiffs' Amended Complaint as to Mr. Johnson.**

This offer is unconditional. This judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiff Joel Vangheluwe may have to damages, or any other form of relief, arising out of the alleged acts or omissions of Mr. Johnson, or any official, employee, or agent, either past or present, of Mr. Johnson, or any agency thereof, in connection with the facts and circumstances that are the subject of this action.

This offer of judgment is made for the purposes specified in Fed. R. Civ. P. 68 and is not to be construed as an admission of liability by Mr. Johnson, or any official, employee, or agent of Mr. Johnson, nor is it an admission that Plaintiff Joel Vangheluwe has suffered any damages.

Acceptance of this offer of judgment will act to release and discharge Mr. Johnson, his succesors and/or assigns, and all past and present officials, employees, representatives, and agents of Mr. Johnson from all claims that were or could have been alleged by Plaintiff Joel Vangheluwe in the above-referenced action.

This offer of judgment will remain open and irrevocable for 14 days after service in accordance with Fed. R. Civ. P. 68(a). If Plaintiff Joel Vangheluwe does not accept within 14 days after service, the offer is considered withdrawn in accordance with Fed. R. Civ. P. 68(b).

Dated: May 16, 2018

Respectfully Submitted,

/s/ Marc J. Randazza

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Case No. 2:18-cv-10542-LJM-EAS


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of May 2018, I served a true and correct copy of the foregoing document via electronic mail and U.S. Mail upon counsel for Plaintiffs listed below:

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Respectfully Submitted,



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